

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

THE NAUGHTYS LLC

Plaintiff,

v.

DOES 1-580

Defendants


Civil Action No. 4:21-CV-00492-O

**DECLARATION OF CHARLES A. WALLACE IN SUPPORT OF
PLAINTIFF'S REPLY IN SUPPORT OF PRELIMINARY INJUNCTION**

I, Charles A. Wallace, pursuant to 28 U.S.C. § 1746, declare as follows:

1. "I am over 18 years of age, of sound mind, and otherwise competent to make this Declaration. The evidence set out in this Declaration is based on my personal knowledge.
2. I am an attorney at the law firm Creedon PLLC, located at 5 Cowboys Way, Suite 300, Frisco, Texas 75034, and I am licensed to practice in the State of Texas.
3. Plaintiff The Naughtys LLC ("The Naughtys") retained Creedon PLLC to represent it in the above-styled lawsuit. As counsel of record for The Naughtys, I have personal knowledge of this lawsuit, the filings in this proceeding, and the facts related thereto.
4. On May 24, 2021, I created the screenshots in Exhibit 1, which show a selection of the pages Responding Defendants mention in Exhibit B to their Response to Plaintiff's Motion for Preliminary Injunction. Dkt. 65-2. The screenshots in Exhibit 1 show that the pages mentioned by the Responding Defendants were, in fact, created or published at least as early as 2018 (not between January 1, 2000 – September 23, 2008 as Responding Defendants suggest). I procured this information by accessing the relevant pages, then choosing to view the pages' source code.
5. The email thread in Exhibit 2 is a true and correct account of an email interaction between myself and an individual who identified himself as a Chinese attorney named "Jesun," who represents several of the defendants in this lawsuit. The redacted portion in Exhibit 2 only omits portions of the email thread where Mr. Jesun listed his clients' settlement offers.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 24, 2021.



Charles A. Wallace
Creedon PLLC